

REMARKS/ARGUMENTS

The Office Action dated August 5, 2004, has been carefully reviewed in light of the Examiner's helpful comments and suggestions.

As a result of the Office Action, claim 1 is objected to for containing a typographical error, which typographical error has been corrected by the above amendment.

Moreover, claims 1-13, 15-20, and 22-28 are rejected under 35 U.S.C. 102(e) as being anticipated by Ramsay. Also, claims 12 and 21 are rejected under 35 U.S.C. 103(a) as being unpatentable over Ramsay. This reference has been carefully reviewed but is not believed to show or suggest Applicant's claimed invention in any manner. Reconsideration and allowance of the pending claims and examination and allowance of the newly added claims is therefore respectfully requested in view of the following remarks.

By the above amendments, the "Summary of the Invention" section of the specification has been amended to better clarify the invention. No new matter has been added. Moreover, claims 1, 16-18, 27, and 28 have been amended, and new claims 29-33 have been added. No new matter has been added.

According to MPEP 2131, a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. Moreover, according to MPEP 2143.03, to establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art.

Claim 1 requires converting the electronic document from the intermediary file

format into destination file format adapted for editing in the second of the environments. Ramsay does not teach or suggest converting between Braille environment document editing and word processing environment document editing without the loss of "document formatting". Ramsay is neither directed to editing of documents nor is it a two way process, which allows editing in either environment and conversion backwards and forwards.

As the Examiner is aware, document formatting as understood by one skilled in the art does not refer to file structure or file formatting but instead refers to the way the document is presented, represented and as described in the description.

Apparatus claim 18 requires a storage device for storing the electronic document in an intermediary file format. However, Ramsay does not teach or suggest an intermediate storage file format. Therefore, it is respectfully submitted that claims 1 and 18 are patentable over Ramsay.

Claims 2-17 are dependent from claim 1 and are therefore allowable for the same reasons as claim 1. Claims 19-26 are dependent from claim 18 and are therefore allowable for the same reasons as claim 18. Claims 27-33 are also believed to be allowable for the same reasons provided in connection with claims 1 and 18.

The prior art references made of record by the Examiner have each been considered but are not believed to obviate against the allowability of the claims as amended or the newly added claims. It is noted that none of these references has been specifically applied by the Examiner against any of the original claims.

Each issue raised in the Office Action dated August 5, 2004, has been

addressed and it is believed that claims 1-33 are in condition for allowance.

Wherefore, Applicant respectfully requests a timely Notice of Allowance be issued in this case.

Respectfully submitted,
DENNISON, SCHULTZ
DOUGHERTY & MACDONALD

By: 

Amir H. Behnia
Reg. No. 50,215
(703) 837-9600 Ext. 16